

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LAUREN W., by and through her parents,
JAMES W. and JEAN W.,

Plaintiffs

v.

BOARD OF EDUCATION OF THE RADNOR
TOWNSHIP SCHOOL DISTRICT,

Defendant

Civil Action

No 02 – cv – 4775

DECLARATION OF HANNAH SCHWARZSCHILD

Hannah Schwarzschild, Esquire hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury, as follows:

1. I am an attorney licensed to practice law in the Commonwealths of Pennsylvania and California and the state of New Jersey, and have been admitted to practice law before the United States District Court for the Eastern District of Pennsylvania, the United States Court of Appeals for the Third Circuit, and the United States District Court for the Northern District of California

2. I graduated from Boalt Hall School of Law, at the University of California in 1989. I worked at Duskow & Schwarzschild in Oakland, California from 1990 through 1994 and Hamburg & Golden, P.C. in Philadelphia, Pennsylvania from 1995 to 1999. I

began employment with Willig, Williams & Davidson in 1999. I was elected partner at Willig, Williams & Davidson effective January 1, 2002.

3. I have extensive experience litigating claims of race, age gender and disability-based discrimination, as well as general matters in civil litigation, in the state and federal courts and before administrative agencies in Pennsylvania, New Jersey and California.


4. As a result of practicing in this area since 1995, I have become familiar with the market rates for attorneys in the Eastern District of Pennsylvania. Based upon my extensive experience in the Eastern District of Pennsylvania, Ms. Merino Reisman's hourly rate of \$255 per hour is well within the range of rates for attorneys with her skill, education and years of experience in civil rights and disability discrimination litigation, as well as civil litigation generally.

5. I have worked with Ms. Merino Reisman as co-counsel while at Hamburg & Golden P.C., and have had the opportunity to review and rely upon her work product in my current position at Willig, Williams & Davidson. Ms. Merino Reisman is an extraordinarily skilled practitioner in the areas of civil rights and discrimination law, as well as in federal court practice. Her intellectual rigor and legal savvy are matched only by her abiding commitment to the needs of her clients. I believe that the quality of her work falls

easily within the top 5 percent of lawyers practicing in this area.

6. I understand that Danielle M. White is an Associate at Montgomery, McCracken, Walker & Rhoads, LLP, received her J.D. from Villanova University School of Law, *cum laude*, in 2001 and has been engaged in litigation practice since graduating. In my experience, her hourly rate of \$150/hour is well within the range for attorneys with her education and years of experience.

7. I have reviewed the contents of this Declaration, and I verify under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief. Executed on 25 September 2002



HANNAH SCHWARZSCHILD